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HOPEWELL NAVIGATION INC.  
erroneously named as Hopwell  
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MIGUEL VALENCIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MIGUEL VALENCIA

Plaintiff,

vs.

HYUNDAI MERCHANT MARINE  
COMPANY, LTD., HOPWELL  
NAVIGATION, INC. and DOES 1-20,

Defendants.

Case No.: C 05 02371 JCS

**STIPULATION AND [PROPOSED]  
ORDER REGARDING PRETRIAL  
CALENDAR**

COME NOW PLAINTIFF MIGUEL VALENCIA AND DEFENDANT HOPEWELL  
NAVIGATION COMPANY AND HEREBY STIPULATE to the following revised pretrial  
calendar. This Stipulation and Proposed Order is proffered because the mediation return date in  
this case, originally scheduled for March 1, 2006, was continued until June 30, 2006, such that  
plaintiff might reach a state of medical permanency prior to mediation. The second Case  
Management Conference date, after which the stay on discovery will be lifted was, in turn,

1 continued to July 21, 2006.

2 The discovery cutoff date, originally set for August 1, 2006, shall now be November 1,  
3 2006. Expert disclosures, originally scheduled for August 1, 2006, will now be made no later  
4 than November 1, 2006. Expert discovery, originally to be completed by September 1, 2006,  
5 will now be completed no later than December 1, 2006.

6  
7 IT IS HEREBY STIPULATED.

8 Dated: May 28, 2006

WELTIN LAW OFFICE

9  
10 By /S/  
11 Patrick B. Streb  
12 Attorneys for Plaintiff  
MIGUEL VALENCIA

13 Dated: May 30, 2006

EMARD, DANOFF, PORT & TAMULSKI, LLP  
14 Andrew I. Port  
15 Katharine Essick

16 By /S/  
17 Andrew I. Port  
18 Attorneys for Defendant  
19 HOPEWELL NAVIGATION INC.

20 **Certification of Signatures**

21 I attest that the content of this document is acceptable to all persons above, who were  
22 required to sign it.

23 /S/  
24 Andrew I. Port

IT IS SO ORDERED.

Dated: June 16, 2006

